UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*CRIMINAL NO. 6:23-CR-00142
	*
VERSUS	*JUDGE SUMMERHAYS
	*
JOSEPH LAWRENCE HARRISON	*MAGISTRATE JUDGE AYO
CODY LAJOHN WILLIAMS	

NOTICE OF GOVERNMENT'S EXPERT WITNESSES AND REQUEST FOR DEFENSE EXPERT WITNESSES

NOW INTO COURT, comes the UNITED STATES OF AMERICA, through the undersigned Assistant United States Attorney, pursuant to Federal Rule of Evidence 702 and Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, hereby provides this notice of the government's intent to use expert testimony in its case-in-chief at trial in the above-referenced case.

The Government also requests written notice, pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure, of any expert witnesses the Defendants, JOSEPH LAWRENCE HARRISON and CODY LAJOHN WILLIAMS, plans to call at trial.

Notice of Expert Witness

The Government may call an expert to testify concerning forensic cellular phone analyses. The experts that may be called include:
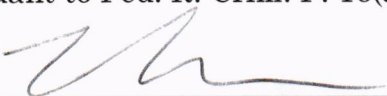
(1)   Detective Neil St.Cyr

Lafayette Parish Sheriff's Office

Digital Forensic Analyst

Statement of Opinions and Bases and Reasons for Opinions: If called to testify, Digital Forensic Analyst St.Cyr would render an expert opinion on cellular phone forensic analyses, mobile device data extrication, data extraction applications including but not limited to Cellebrite UFED V7 and Oxygen Forensic Detective

V15.3.0.86, the type of mobile data that can be collected by these programs. This will include the methodologies and techniques utilized to extract data, including but not limited to meta data for text messages, videos, photographs, call detail records. He will also testify about the results of forensic examinations that he performed on cellular devices collected during the investigation as indicated in the attached Digital Forensics Report.

Training/Qualifications: Digital Forensic Analyst St.Cyr will testify about his training, qualifications, and experience consistent with his attached Curriculum Vitae. He has been a certified Digital Forensic Analyst since May 2001. In that capacity, he is trained in using Cellebrite, Oxygen, Gray Key, and other digital forensic software and routinely uses these programs to extract and analyze data. His duties including conducting computer/cellular forensics and the forensic collection, preservation, examination, and presentation of forensic artifacts as an expert witness for criminal proceedings. He has not testified in any prior proceedings nor authored any publications in the last 10 years.
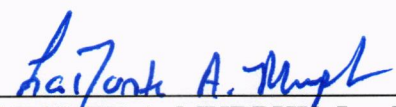
Pursuant to Fed. R. Crim. P. 16(a)(1)(G)(v) I approve the foregoing disclosure.

_____
Detective Neil St.Cyr,
Lafayette Parish Sheriff's Office
Digital Forensic Analyst

Respectfully submitted,

BRANDON B. BROWN
United States Attorney

_____
LADONTE A. MURPHY, La. Bar No. 31272
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: (337) 262-6618

2

Lafayette Parish
Sheriff's Office
Digital Forensics Report
Examiner Detective Neil St.Cyr
(337-236-5635)

The contents of this report are prepared based on the evidence available at the time of writing. The author of this report reserves the right to change finding based on additional information. This report may contain sensitive or illicit material. This report should be viewed only by authorized personnel.

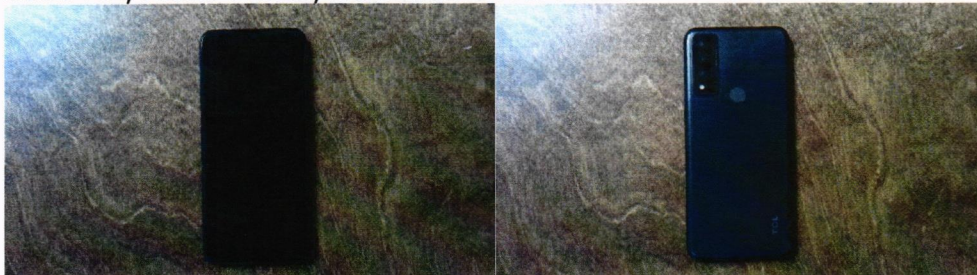| Agency Requesting	Lafayette Parish Sheriff's Office
Agency Case Number	23-0050306
Case Agent	Det Brandon Malaxonis
Type of Request	Cell phone extraction
Device One	TCL T767W
Device Two	Samsung

Case Summary

On February 22, 2023 at approximately 1310 hours, Detective Brandon Malaxonis provided me with three cellphones: TCL, Samsung, Iphone in reference to a Aggravated Kidnapping, case 23-00050306. Det. Malaxonis requested a full extraction of all three phones. Det. Malaxonis provided me with a request for examination and search warrant signed by 15th JDC Commissioner Andre Doguet for all three devices. The devices and paperwork were secured in a locked evidence cabinet until further processing was available.

Evidence Description

Device One

Black TCL, Model T767W, IMEI 016168000705118.

Device Two

Device Three

Extraction Method and Tools

Tools Used

Cellebrite UFED	V7.62.0.173
Cellebrite Physical Analyzer	V7.59.1.16
Oxygen Forensic Detective	V15.3.0.86

Documentation and Extraction

On February 22, 2023 at approximately 1443 hours, I retrieved device one (TCL) from the locked evidence cabinet. I began photographing the device noting it was in good condition with minor wear. I reviewed the search warrant and verified the device matched that of the device on the search warrant. I turned on the device and observed the device to be unlocked and in airplane mode. I entered the settings menu where I enabled developer options. In developer options I turned on stay awake and USB debugging.

At approximately 1448 hours, I connected the device to a forensic computer and began an advanced logical extraction followed by an MTK Live full file system extraction using Cellebrite UFED V7.62.0.173. Once completed I kept the device connected and began an Oxygen Android Agent extraction using Oxygen Forensic Detective V15.3.0.86. These tasks completed successfully at approximately 1554 hours.

Upon completion I disconnected the device and returned the settings to previous. I then imported the extractions into the affiliated readers. I generated a report for each extraction that has been attached with this report. I returned the device to the locked evidence cabinet until released to detectives.

No further information at this time.

END OF REPORT

Det. Malaxonis was notified that the extractions and analysis were completed. All photographs obtained and reports prepared were saved to an appropriate storage device for digital evidence. The evidence was returned to the locked evidence cabinet until released to Det Malaxonis.

Detective Neil St.Cyr
Lafayette Parish Sheriff's Office

Disclaimer

It is the decision of the working case agent/officer to determine if the extracted data is of evidentiary value. The Lafayette Parish Sheriff's Office will maintain the original image files until the case(s) has been adjudicated. Requests for copies and/or further examinations may be directed to Detective Neil St.Cyr at (337) 236-5635 or Neil.StCyr@LafayetteSheriff.com Depending on file size, storage media may need to be provided by the requesting party.

NEIL ST. CYR
LAFAYETTE PARISH SHERIFF'S OFFICE FORENSIC DATA INVESTIGATOR

Phone: (337) 236-5635
Neil.StCyr@LafayetteSheriff.com

301 W Vermillion St
Lafayette, LA 70503

EDUCATION

BS   University of Louisiana at Lafayette, General Studies   May 2007
Minored in Criminal Justice

EXPERIENCE

Lafayette Parish Sheriff's Office September 2007-Present

Forensic Data Investigator	May 2021 - Present
Crimes Against Persons Investigator	July 2015 – May 2021
Support Service Canine Handler	September 2010 – July 2015
Patrol Deputy	September 2007 – September 2010

PROFESSIONAL TRAINING

Advanced Mobile Device Examiner
National Computer Forensics Institute U.S.S.S.
September 18, 2023 – September 29, 2023 Hoover, AL

Drone Analysis and Forensics
National Computer Forensics Institute U.S.S.S.
July 31, 2023 – August 4, 2023 Hoover, AL

Digital Investigations Supervisors Course
National Computer Forensics Institute U.S.S.S.
May 23, 2023 – May 25, 2023 Hoover, AL

Vehicle Forensics Course
National Computer Forensics Institute U.S.S.S.
May 1, 2023 – May 5, 2023

Cellebrite Certified Operator
National Computer Forensics Institute U.S.S.S.
March 16, 2023 – March 17, 2023 Hoover, AL

Mobile Device Examiner Program
National Computer Forensics Institute U.S.S.S.
February 27, 2023 – March 16, 2023 Hoover, AL

St. Cyr - 1

Forensic Scripting
National Computer Forensics Institute U.S.S.S.
December 12, 2022 – December 16, 2022 Hoover, AL

Cellebrite Certified Physical Analyst
Cellebrite
October 5, 2022 – October 7, 2022 Lafayette, LA

Cellebrite Certified Operator
Cellebrite
October 3, 2022 – October 4, 2022 Lafayette, LA

Forensic Explorer Introduction Training
National Computer Forensics Institute U.S.S.S.
May 9, 2022 – May 10, 2022 Hoover, AL

Basic Computer Evidence Recovery Training
National Computer Forensics Institute U.S.S.S.
April 18, 2022 – May 19, 2022 Hoover, AL

Social Networking Investigations
National Computer Forensics Institute U.S.S.S.
December 13, 2021 – December 17, 2021 Hoover, AL

Intro to ICAC/NCMEC Investigations and Basic Forensics
Louisiana Bureau of Investigations Cyber Crime Unit
November 16, 2021 – November 18, 2021 Baton Rouge, LA

Digital Video Recorders
National Computer Forensics Institute U.S.S.S.
November 8, 2021 – November 12, 2021 Hoover, AL

Digital Evidence Investigations
National Computer Forensics Institute U.S.S.S.
May 31, 2021 – June 4, 2021 Hoover, AL

Death and Homicide Investigation
Public Agency Training Council
October 19, 2020 – October 23, 2020 Gonzales, LA

Cell Hawk New User and Refresher Training
Hawk Analytics
June 5, 2019 Lafayette, LA

2018 Louisiana Homicide Investigation Association Homicide Conference
Louisiana Homicide Investigators" Association

St. Cyr - 2

September 10, 2018 – September 14, 2018

26th Annual Homicide Conference
Regional Organized Crime Information Center
September 17-20, 2017 Biloxi, MS

"Blood Bullets and More" Techniques for Investigating Violent Crime
Texas Forensic Associates Consulting and Training
June 1, 2016 – June 3, 2016 Galveston, TX

2015 Louisiana Homicide Investigations Association Homicide Conference
Louisiana Homicide Investigators' Association
August 31, 2015 - September 4, 2015 Lake Charles, LA

COMPUTER SKILLS

Windows OS, Cellebrite UFED 4PC, Cellebrite Physical Analyzer, Oxygen Forensics Detective, GrayKey, Magnet Axiom, FTK Imager, OS Forensics, Data Pilot, Forensic Explorer, Ace Input, Autopsy, Word, Excel, Python, CellHawk, DVR Examiner, iVE, DCode, HxD, DB Browser.

CERTIFICATIONS

Cellebrite Certified Operator
National Computer Forensics Institute
March 17, 2023 Hoover, AL

Cellebrite Certified Physical Analyzer
Cellebrite
October 7, 2022 Lafayette, LA

Cellebrite Certified Operator
Cellebrite
October 4, 2022 Lafayette, LA

OS Forensics Triage Certification
PassMark Software
November 18, 2021 Baton Rouge, LA

St. Cyr - 3